

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
2 Charles K. Verhoeven (Bar No. 170151)
charlesverhoeven@quinnemanuel.com
3 David A. Perlson (Bar No. 209502)
davidperlson@quinnemanuel.com
4 Melissa Baily (Bar No. 237649)
melissabaily@quinnemanuel.com
5 John Neukom (Bar No. 275887)
johnneukom@quinnemanuel.com
6 Jordan Jaffe (Bar No. 254886)
jordanjaffe@quinnemanuel.com
7 50 California Street, 22nd Floor
San Francisco, California 94111-4788
8 Telephone: (415) 875-6600
Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

18 CASE NO. 3:17-cv-00939-WHA

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**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF THEIR MOTION FOR
RELIEF FROM AND EMERGENCY
MOTION FOR STAY OF NON-
DISPOSITIVE PRETRIAL ORDER OF
MAGISTRATE JUDGE (DKT. 951)**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants’ Administrative Motion to File Under
 7 Seal Portions of Their Motion for Relief from and Emergency Motion for Stay of Non-Dispositive
 8 Pretrial Order of Magistrate Judge (Dkt. 951) (the “Administrative Motion”). The Administrative
 9 Motion seeks an order sealing highlighted portions of Defendants’ Motion for Relief from and
 10 Emergency Motion for Stay (“Uber’s Motion”).

11 3. The portions of Uber’s Motion marked in red boxes contain or reference trade secret
 12 and confidential business information, which Waymo seeks to seal.

13 4. Uber’s Motion (portions in red boxes in version filed herewith) contain, reference,
 14 and/or describe Waymo’s asserted trade secrets. The information Waymo seeks to seal includes the
 15 confidential design and functionality of Waymo’s proprietary autonomous vehicle system, which
 16 Waymo maintains as secret. I understand that these trade secrets are maintained as secret by Waymo
 17 (Dkt. 25-47) and are valuable as trade secrets to Waymo’s business (Dkt. 25-31). The public
 18 disclosure of this information would give Waymo’s competitors access to descriptions of the
 19 functionality or features of Waymo’s autonomous vehicle system. If such information were made
 20 public, I understand that Waymo’s competitive standing would be significantly harmed.

21 5. Waymo’s request to seal is narrowly tailored to those portions of Uber’s Motion that
 22 merit sealing.

23 I declare under penalty of perjury under the laws of the State of California and the United
 24 States of America that the foregoing is true and correct, and that this declaration was executed in San
 25 Francisco, California, on July 28, 2017.

26 By /s/ Felipe Corredor

27 Felipe Corredor
 28 Attorneys for WAYMO LLC

1 **ATTESTATION**

2 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
3 document has been obtained from Felipe Corredor.

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5 By: /s/ Charles K. Verhoeven
6 Charles K. Verhoeven

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